

REMARKS

Applicant has reviewed and considered the Office Action mailed on September 24, 2007, and the references cited therein.

Claim 26 is amended, claims 4 and 34 are canceled, and no claims are added; as a result, claims 1-3 and 5-33 are now pending in this application.

35 USC § 112 Rejection of the Claims

Claims 4 and 34 were rejected under 35 USC § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Claims 4 and 34 have been canceled without prejudice.

35 USC § 103 Rejection of the Claims

Claims 1-6 and 8-34 were rejected under 35 USC § 103(a) as being unpatentable over *Gu* (US Publication 2004/0260800) in view of *Okano* (US Publication 2002/0062485).

Claim 1 is an independent claim directed to a client device comprising: (a) an ad-hoc client to manage connection of said client device to an ad-hoc wireless network; (b) a DHCP client to send a DHCP discover message in response to a command from said ad-hoc client; and (c) a tinyDHCP unit to sense said DHCP discover message and allocate an IP address for the client device in response thereto.

Neither *Gu* nor *Okano*, either alone or in combination, disclose or suggest “a tinyDHCP unit to sense said DHCP discover message and allocate an IP address for the client device in response thereto.” As is well known in the art, a DHCP discover message is a message that is broadcast in a network to obtain an IP address from a DHCP server in the network. The claimed tinyDHCP senses, from within the client device itself, the DHCP discover message sent by the DHCP client and allocates an IP address in response thereto. It thus appears to the DHCP client that it is dealing with an actual DHCP server in the network and not functionality within the same client device. *Gu* discloses a device that is capable of developing its own IP address when there is no DHCP server available in a corresponding network, but the device does not include functionality that allows a DHCP client within the device to operate as if a DHCP server were

available (i.e., just send the normal DHCP discover message, etc.). Okano was only cited to show that it was well known to allocate an IP address to a client device from a DHCP server.

Based on the foregoing, it is submitted that the subject matter of claim 1 would not have been obvious to a person of ordinary skill in the art based on the combination of Gu and Okano. Reconsideration and allowance of claim 1 is therefore respectfully requested. Independent claim 30 should be allowable for at least the same reasons as claim 1.

Claim 14 is an independent claim directed to a method for use in connecting a client device to an ad-hoc network. More specifically, the method includes: (a) sending a DHCP discover message from within the client device; (b) receiving said DHCP discover message within the client device; and (c) allocating an IP address to the client device in response to receiving said DHCP discover message, within the client device.

Neither Gu nor Okano, either alone or in combination, disclose or suggest “receiving said DHCP discover message within the client device” or “allocating an IP address to the client device in response to receiving said DHCP discover message, within the client device.” As described above, it is well known in the art that a DHCP discover message is a message that is broadcast in a network to obtain an IP address from a DHCP server in the network. Neither of the references cited by the Examiner teach the reception of such a DHCP discover message within the originating client device or allocating an IP address to the originating client device from within the device in response to the received discover message. The Examiner is apparently taking the position that Gu discloses “receiving said DHCP discover message within the client device” in Fig. 29 where either unit 900 or unit 950 receives a DHCP broadcast discover response message. However, claim 14 clearly states that the DHCP discover message is received within the client device, not a discover response message. Furthermore, the claim uses the definite article “said” in front of “DHCP discover message” in the “receiving” element, meaning it is the same DHCP discover message that is the subject of the “sending” element. The DHCP discovery response message in Fig. 29 of Gu is clearly different from the original DHCP broadcast message. Again, Okano was only cited as showing that it was well known to allocate an IP address to a client device from a DHCP server. Okano does not disclose or suggest allocating an IP address to a client device, from within the client device itself, in response to the receipt of a DHCP discover message that originates within the client device.

Based on the foregoing, it is submitted that the subject matter of claim 14 would not have been obvious to a person of ordinary skill in the art based on the combination of Gu and Okano. Reconsideration and allowance of claim 14 is therefore respectfully requested. Independent claim 26 should be allowable for at least the same reasons as claim 14.

Claims 2-3, 5-6, and 8-13, claims 15-25, claims 27-29, and claims 31-33 are dependent claims that depend either directly or indirectly from independent claims 1, 14, 26, and 30, respectively. Consequently, these claims are allowable for at least the same reasons as their corresponding base claims. These claims also provide further bases for patentability. For example, claim 2 adds “a packet driver” to the client device of claim 1 “to provide raw access to a wireless network medium for at least the tinyDHCP unit without using sockets functionality.” Neither Gu nor Okano discloses or suggests such a packet driver. The Examiner cites a list of structures within Figs. 25 and 30, but does not explain his reasoning as to which of these structures, if any, corresponds to the claimed packet driver. It is respectfully requested that the Examiner provide such explanation if the present rejection is maintained. Claim 5 further defines the “DHCP client” of claim 1 as sending said DHCP discover message to a predetermined port that is monitored by said tinyDHCP unit. By monitoring the port to which the DHCP client sends the DHCP discover message, the tinyDHCP unit is able to sense the discover message and thus allocate the IP address in response thereto. Neither Gu nor Okano discloses or suggests this.

Claim 8 further defines the “tinyDHCP unit” of claim 1 as sending a DHCP offer that includes the IP address. Claim 9 further defines the “tinyDHCP unit” of claim 8 as sending the DHCP offer to a predetermined port that is monitored by the DHCP client. Claim 10 further defines the “DHCP client” of claim 8 as sensing the DHCP offer and sending a DHCP request based thereon, wherein the DHCP request includes the IP address.” Claim 12 further defines the “tinyDHCP unit” of claim 10 as sensing the DHCP request and sending a DHCP acknowledge (ACK) message in response thereto. Neither Gu nor Okano discloses or suggests any of these features.

Claims 4 and 34 have been canceled without prejudice.

Claim 7 was rejected under 35 USC § 103(a) as being unpatentable over *Gu* (US Publication 2004/0260800) in view of *Okano* (US Publication 2002/0062485) further in view of *Gardiner* (US Publication 2003/0225864).

Claim 7 is a dependent claim that depends directly from independent claim 1. Consequently, this claim is allowable for at least the same reasons as claim 1.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney (480-948-3745) to facilitate prosecution of this application.

Respectfully submitted,

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By his Representatives,

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480-948-3745

Date: December 12, 2007

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 12th day of December, 2007.

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